

1 Jeffrey H. Howard (*pro hac vice*)  
2 Jerome A. Murphy (*pro hac vice*)  
CROWELL & MORING LLP  
3 1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
4 Telephone: 202-624-2500  
Facsimile: 202-628-5116  
5 Email: [jhoward@crowell.com](mailto:jhoward@crowell.com)  
[jmurphy@crowell.com](mailto:jmurphy@crowell.com)

6 Jason C. Murray (CA Bar No. 169806)  
7 Joshua C. Stokes (CA Bar No. 220214)  
CROWELL & MORING LLP  
515 South Flower St., 40th Floor  
8 Los Angeles, CA 90071  
Telephone: 213-622-4750  
9 Facsimile: 213-622-2690  
10 Email: jmurray@crowell.com  
jstokes@crowell.com

11 | Counsel for Plaintiff Motorola Mobility, Inc.

12 || [Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Master Docket No. 07-m-1827 SI

## 19 || This Document Relates To:

20 *Motorola Mobility, Inc. v. AU Optronics Corporation, et al., C 09-5840 SI*

Target Corporation, et al., v. AU Optronics Corporation, et al., 3:10-cv-4945 SI

**STIPULATION AND [PROPOSED]  
ORDER REGARDING RULE 30(B)(6)  
DEPOSITION OF PHILIPS  
ELECTRONICS NORTH AMERICA  
CORPORATION AND FACT  
DISCOVERY CUT-OFF**

1           Defendant Philips Electronics North America Corporation (“PENAC”) and Plaintiffs  
 2 Motorola Mobility, Inc.; Target Corp.; Sears, Roebuck and Co.; Kmart Corp.; Old Comp Inc.;  
 3 Good Guys, Inc.; RadioShack Corp; and Newegg Inc. (“Plaintiffs”) stipulate as follows:

4           WHEREAS Plaintiffs have noticed the deposition of PENAC pursuant to Federal Rule of  
 5 Civil Procedure 30(b)(6);

6           WHEREAS the discovery cut-off in the Direct Action Plaintiffs’ track one cases is  
 7 December 8, 2011;

8           WHEREAS PENAC was added to Plaintiffs’ respective actions in the past few months;

9           WHEREAS the parties have had limited time to conduct discovery;

10          WHEREAS PENAC is still diligently working to produce documents to Plaintiffs;

11          WHEREAS Plaintiffs and PENAC have met and conferred regarding scheduling the Rule  
 12 30(b)(6) deposition of PENAC; and

13          WHEREAS the parties are discussing a potential resolution to the above-captioned  
 14 actions;

15          THEREFORE, PENAC, by its counsel, and Plaintiffs, by the undersigned counsel,  
 16 stipulate and agree as follows:

17          1.       The fact discovery cutoff date of December 8, 2011 set forth in the Order  
 18 Modifying Pretrial Schedule for “Track One” Direct Action Plaintiff and State Attorney General  
 19 Cases (MDL Dkt. No. 3110) is extended up to and including February 29, 2012, solely as to the  
 20 deposition of PENAC.

21          2.       If disputes arise at the deposition, Plaintiffs will have five court days to move to  
 22 compel further responses.

23           ///

24           ///

25           ///

26           ///

27           ///

28           ///

3. Unless expressly provided herein, nothing in this Stipulation and Order is intended to modify any other Order of the Court or the Special Master, nor does this order prevent any party from seeking further modifications to such orders.

Dated: December 6, 2011

/s/ Nathaniel J. Wood

Jason C. Murray (CA Bar No. 169806)  
Joshua C. Stokes (CA Bar No. 220214)  
Nathaniel J. Wood (CA Bar No. 223547)  
CROWELL & MORING LLP  
515 South Flower St., 40th Floor  
Los Angeles, CA 90071  
Telephone: 213-622-4750  
Facsimile: 213-622-2690  
Email: jmurray@crowell.com  
jstokes@crowell.com  
nwood@crowell.com

Jeffrey H. Howard (pro hac vice)  
Jerome A. Murphy (pro hac vice)  
**CROWELL & MORING LLP**  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Telephone: 202-624-2500  
Facsimile: 202-628-5116  
Email: [jhoward@crowell.com](mailto:jhoward@crowell.com)  
[jmurphy@crowell.com](mailto:jmurphy@crowell.com)

Kenneth L. Adams (pro hac vice)  
R. Bruce Holcomb (pro hac vice)  
Christopher T. Leonardo (pro hac vice)  
ADAMS HOLCOMB LLP  
1875 Eye Street NW  
Washington, DC 20006  
Telephone: 202-580-8822  
Facsimile: 202-580-8821  
Email: [adams@adamsholcomb.com](mailto:adams@adamsholcomb.com)  
[holcomb@adamsholcomb.com](mailto:holcomb@adamsholcomb.com)  
[leonardo@adamsholcomb.com](mailto:leonardo@adamsholcomb.com)

*Counsel for Plaintiffs Motorola Mobility, Inc. and Jaco Electronics, Inc.*

*/s/ Brendan P. Cullen*

Brendan P. Cullen (SBN 194057)  
SULLIVAN & CROMWELL LLP  
1870 Embarcadero Road  
Palo Alto, California 94303  
Telephone: (650) 461-5600  
Facsimile: (650) 461-5700  
[cullenb@sullcrom.com](mailto:cullenb@sullcrom.com)

Garrard R. Beeney (NY Reg. No. 1656172)  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004-2498  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
[beeneyg@sullcrom.com](mailto:beeneyg@sullcrom.com)

*Counsel for Defendants Philips Electronics North America Corporation and Koninklijke Philips Electronics N.V.*

**Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from the other signatories.**

## IT IS SO ORDERED.

Dated: 12/8, 2011

Susan Holton

Susan Illston, United States District Judge

DCACTIVE-16775344.1